



## T. A. BLACKBURN LAW

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**VIA ecf:**

Hon. J. Paul Oetken  
Thurgood Marshall, United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Jones v. Combs, et al.; Case No. 24-1457

Dear Judge Oetken,

I write on behalf of Plaintiff Rodney Jones to respectfully submit a motion for leave to serve Defendants Cuba Gooding Jr. and Justin Dior Combs by publication, pursuant to Fed. R. Civ. P. 4(e)(1) and CPLR §§ 308(5) and 316.

As detailed in the accompanying memorandum of law and declaration, Plaintiff has made diligent, documented efforts to serve both defendants. Mr. Gooding Jr. has a documented history of evading service in numerous cases (including *Harbert v. Gooding* and *Abbay v. Gooding*), while Mr. Combs has deliberately concealed himself behind private gates, ignoring repeated efforts and certified mail. Service has been attempted at every known address and gate access point, including at 1- and 2-Star Island Drive in Miami Beach.

Plaintiff seeks permission to serve both defendants via publication in the *New York Times* and *Los Angeles Times*, once per week for four weeks. A full motion package, including a memorandum of law, declaration with exhibits, and a proposed order, is enclosed.

Respectfully Submitted,

Tyrone A. Blackburn, Esq.  
Tyrone A. Blackburn, Esq.

CC: All attorneys of record via email